

**From:** Rand Crafts  
**To:** Milka Radulovic  
**Date:** Thursday, June 19, 2003 7:57 AM  
**Subject:** Re: new AO draft

**CC:** Blaine Ipson  
Milka,

Yes, I have done a cursory overview of the suggested terms and conditions. My thought on this is that we should not have to go as far as 3 hour, 8 hour or 24 hour limits. Of the 20 or so recent actually issued permitting of coal fired plants, the "short term limit" was based on a 30-day rolling average. I think this is especially appropriate for retrofit technology regarding BACT. I could only find one issued permit with a shorter term limit, and that could have been in a non-attainment area, though I'm just guessing.

Regardless of what we work out, though, it will have to wait for actual numbers from testing data. I'm sure that from the rumblings of the performance group, we will have to do some remodeling. Apparently some retrofits take a little more "tuning."

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>>> "Milka Radulovic" <MilkaR@utah.gov> Tuesday, June 17, 2003 4:05:25 PM >>>

Hi Rand,  
Did you have a chance to look at the first part of the draft and CO  
limits?  
Thanks  
Milka